CRISTINA C. ARGUEDAS (SBN 87787) MATTI S. FROMSON (SBN 197460) ARGUEDAS, CASSMAN & HEADLÉY 2 803 Hearst Avenue 3 Berkeley, California 94710 Telephone: (510) 845-3000 4 Attorneys for Defendant 5 RENE MEDINA 6 7 UNITED STATES DISTRICT COURT 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 UNITED STATES OF AMERICA. NO. CR 06-0144 JSW 10 Plaintiff, STIPULATION AND [proposed] ORDER 11 TO RECONVEY PASSPORT OF MILA **MEDINA** VS. 12 13 RENE M. MEDINA 14 Defendant. 15 STIPULATION 16 17 On December 8, 2006 the parties appeared before this Court on Mr. Medina's motion to modify the conditions of his release. At the hearing on that motion, this Court 18 ordered that conditions of Mr. Medina's release be modified to permit him to travel to the 19 Philippines between December 27, 2006 and January 20, 2007. On December 11, 2006 20 21 this Court signed an order prepared by Medina's counsel, ordering that the Clerk of the Court return Mr. Medina's passport to him. Mila Medina, Mr. Medina's wife, is planning to 22 travel with Mr. Medina to the Philippines. Unfortunately, counsel for Medina neglected to 23 24 include Mila Medina's passport in the proposed order submitted to and signed by this 25 Court. The U.S. Attorney has been notified of this oversight, and stipulates to the return of 26 Mila Medina's passport for the purpose of the above-described trip. // 27

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1	So stipulated.	
2	Dated: December 18, 2006	ARGUEDAS, CASSMAN &HEADLEY
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4		/s/
5		MATTI FROMSON Attorneys for Defendant
6		RENE M. MEDINA
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8	Dated: December 18, 2006	/s/
9	Batod: Bootinson 10, 2000	CYNTHIA STIER Assistant United States Attorney
10		Addition of the
11	ORDER	
12	In order to effectuate the above-described travel to the Philippines, it is hereby	
13	ORDERED that the Clerk of the Court immediately reconvey Mila Medina's passport. It is	
14	further ORDERED that Ms. Medina re-surrender her passport to the Clerk of the Court	
15	within 72 hours of her return to the United States.	
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17	Dated: December 18, 2006	0 00
18 19	Han Barnfrid Timmarman	
20		Hon. Bern ard Zimmerman United States Magistrate Judge
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